

FEDERAL OPERATING PERMIT

A FEDERAL OPERATING PERMIT IS HEREBY ISSUED TO
Georgia-Pacific Wood Products South LLC

AUTHORIZING THE OPERATION OF
Pineland Manufacturing Complex
Sawmills and Planing Mills

LOCATED AT
Sabine County, Texas
Latitude 31° 15' 0" Longitude 93° 58' 30"
Regulated Entity Number: RN100217744

This permit is issued in accordance with and subject to the Texas Clean Air Act (TCAA), Chapter 382 of the Texas Health and Safety Code and Title 30 Texas Administrative Code Chapter 122 (30 TAC Chapter 122), Federal Operating Permits. Under 30 TAC Chapter 122, this permit constitutes the permit holder's authority to operate the site and emission units listed in this permit. Operations of the site and emission units listed in this permit are subject to all additional rules or amended rules and orders of the Commission pursuant to the TCAA.

This permit does not relieve the permit holder from the responsibility of obtaining New Source Review authorization for new, modified, or existing facilities in accordance with 30 TAC Chapter 116, Control of Air Pollution by Permits for New Construction or Modification.

The site and emission units authorized by this permit shall be operated in accordance with 30 TAC Chapter 122, the general terms and conditions, special terms and conditions, and attachments contained herein.

This permit shall expire five years from the date of issuance. The renewal requirements specified in 30 TAC § 122.241 must be satisfied in order to renew the authorization to operate the site and emission units.

Permit No: 02407 Issuance Date: December 19, 2013

For the Commission

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General Terms and Conditions

The permit holder shall comply with all terms and conditions contained in 30 TAC § 122.143 (General Terms and Conditions), 30 TAC § 122.144 (Recordkeeping Terms and Conditions), 30 TAC § 122.145 (Reporting Terms and Conditions), and 30 TAC § 122.146 (Compliance Certification Terms and Conditions).

In accordance with 30 TAC § 122.144(1), records of required monitoring data and support information required by this permit, or any applicable requirement codified in this permit, are required to be maintained for a period of five years from the date of the monitoring report, sample, or application unless a longer data retention period is specified in an applicable requirement. The five year record retention period supersedes any less stringent retention requirement that may be specified in a condition of a permit identified in the New Source Review Authorization attachment.

If the permit holder chooses to demonstrate that this permit is no longer required, a written request to void this permit shall be submitted to the Texas Commission on Environmental Quality (TCEQ) by the Responsible Official in accordance with 30 TAC § 122.161(e). The permit holder shall comply with the permit's requirements, including compliance certification and deviation reporting, until notified by the TCEQ that this permit is voided.

The permit holder shall comply with 30 TAC Chapter 116 by obtaining a New Source Review authorization prior to new construction or modification of emission units located in the area covered by this permit.

All reports required by this permit must include in the submittal a cover letter which identifies the following information: company name, TCEQ regulated entity number, air account number (if assigned), site name, area name (if applicable), and Air Permits Division permit number(s).

Special Terms and Conditions:

Emission Limitations and Standards, Monitoring and Testing, and Recordkeeping and Reporting

1. Permit holder shall comply with the following requirements:
 - A. Emission units (including groups and processes) in the Applicable Requirements Summary attachment shall meet the limitations, standards, equipment specifications, monitoring, recordkeeping, reporting, testing, and other requirements listed in the Applicable Requirements Summary attachment to assure compliance with the permit.
 - B. The textual description in the column titled "Textual Description" in the Applicable Requirements Summary attachment is not enforceable and is not deemed as a substitute for the actual regulatory language. The Textual Description is provided for information purposes only.
 - C. A citation listed on the Applicable Requirements Summary attachment, which has a notation [G] listed before it, shall include the referenced section and subsection for all commission rules, or paragraphs for all federal and state regulations and all subordinate paragraphs, subparagraphs and clauses, subclauses, and items contained within the referenced citation as applicable requirements.

- D. When a grouped citation, notated with a [G] in the Applicable Requirements Summary, contains multiple compliance options, the permit holder must keep records of when each compliance option was used.
 - E. Emission units subject to 40 CFR Part 63, Subpart DDDD as identified in the attached Applicable Requirements Summary table are subject to 30 TAC Chapter 113, Subchapter C, § 113.870 which incorporates the 40 CFR Part 63 Subpart by reference.
 - F. Emission units subject to 40 CFR Part 63, Subpart ZZZZ as identified in the attached Applicable Requirements Summary table are subject to 30 TAC Chapter 113, Subchapter C, § 113.1090 which incorporates the 40 CFR Part 63 Subpart by reference.
 - G. The permit holder shall comply with the applicable requirements of 40 CFR Part 63, Subpart DDDDD and 30 TAC Chapter 113, Subchapter C, § 113.1130 as identified in the attached Applicable Requirements Summary by January 31, 2017. This is a one year extension of the compliance date granted in accordance with § 63.6(i)(4)(i)(A). The permit holder shall comply with the requirements contained in the Alternative Requirements attachment of this permit. The permit holder shall maintain a copy of the documentation from the TCEQ Executive Director granting the compliance extension. Documentation shall be maintained and made available in accordance with 30 TAC § 122.144.
 - H. For the purpose of generating discrete emission reduction credits through 30 TAC Chapter 101, Subchapter H, Division 4 (Discrete Emission Credit Banking and Trading), the permit holder shall comply with the following requirements:
 - (i) Title 30 TAC § 101.372 (relating to General Provisions)
 - (ii) Title 30 TAC § 101.373 (relating to Discrete Emission Reduction Credit Generation and Certification)
 - (iii) Title 30 TAC § 101.374 (relating to Mobile Discrete Emission Reduction Credit Generation and Certification)
 - (iv) Title 30 TAC § 101.375 (relating to Emission Reductions Achieved Outside the United States)
 - (v) Title 30 TAC § 101.378 (relating to Discrete Emission Credit Banking and Trading)
 - (vi) The terms and conditions by which the emission limits are established to generate the discrete reduction credit are applicable requirements of this permit
2. The permit holder shall comply with the following sections of 30 TAC Chapter 101 (General Air Quality Rules):
- A. Title 30 TAC § 101.1 (relating to Definitions), insofar as the terms defined in this section are used to define the terms used in other applicable requirements
 - B. Title 30 TAC § 101.3 (relating to Circumvention)

- C. Title 30 TAC § 101.8 (relating to Sampling), if such action has been requested by the TCEQ
 - D. Title 30 TAC § 101.9 (relating to Sampling Ports), if such action has been requested by the TCEQ
 - E. Title 30 TAC § 101.10 (relating to Emissions Inventory Requirements)
 - F. Title 30 TAC § 101.201 (relating to Emission Event Reporting and Recordkeeping Requirements)
 - G. Title 30 TAC § 101.211 (relating to Scheduled Maintenance, Start-up, and Shutdown Reporting and Recordkeeping Requirements)
 - H. Title 30 TAC § 101.221 (relating to Operational Requirements)
 - I. Title 30 TAC § 101.222 (relating to Demonstrations)
 - J. Title 30 TAC § 101.223 (relating to Actions to Reduce Excessive Emissions)
3. Permit holder shall comply with the following requirements of 30 TAC Chapter 111:
- A. Visible emissions from stationary vents with a flow rate of less than 100,000 actual cubic feet per minute and constructed after January 31, 1972 that are not listed in the Applicable Requirements Summary attachment for 30 TAC Chapter 111, Subchapter A, Division 1 , shall not exceed 20% opacity averaged over a six-minute period. The permit holder shall comply with the following requirements for stationary vents at the site subject to this standard:
 - (i) Title 30 TAC § 111.111(a)(1)(B) (relating to Requirements for Specified Sources)
 - (ii) Title 30 TAC § 111.111(a)(1)(E)
 - (iii) Title 30 TAC § 111.111(a)(1)(F)(i), (ii), (iii), or (iv)
 - (iv) For emission units with vent emissions subject to 30 TAC § 111.111(a)(1)(B), complying with 30 TAC § 111.111(a)(1)(F)(ii), (iii), or (iv), and capable of producing visible emissions from, but not limited to, particulate matter, acid gases and NO_x, the permit holder shall also comply with the following periodic monitoring requirements for the purpose of annual compliance certification under 30 TAC § 122.146. These periodic monitoring requirements do not apply to vents that are not capable of producing visible emissions such as vents that emit only colorless VOCs; vents from non-fuming liquids; vents that provide passive ventilation, such as plumbing vents; or vent emissions from any other source that does not obstruct the transmission of light. Vents, as specified in the “Applicable Requirements Summary” attachment, that are subject to the emission limitation of 30 TAC § 111.111(a)(1)(B) are not subject to the following periodic monitoring requirements:
 - (1) An observation of stationary vents from emission units in operation shall be conducted at least once during each calendar

quarter unless the emission unit is not operating for the entire quarter.

- (2) For stationary vents from a combustion source, if an alternative to the normally fired fuel is fired for a period greater than or equal to 24 consecutive hours, the permit holder shall conduct an observation of the stationary vent for each such period to determine if visible emissions are present. If such period is greater than 3 months, observations shall be conducted once during each quarter. Supplementing the normally fired fuel with natural gas or fuel gas to increase the net heating value to the minimum required value does not constitute creation of an alternative fuel.
- (3) Records of all observations shall be maintained.
- (4) Visible emissions observations of emission units operated during daylight hours shall be conducted no earlier than one hour after sunrise and no later than one hour before sunset. Visible emissions observations of emission units operated only at night must be made with additional lighting and the temporary installation of contrasting backgrounds. Visible emissions observations shall be made during times when the activities described in 30 TAC § 111.111(a)(1)(E) are not taking place. Visible emissions shall be determined with each stationary vent in clear view of the observer. The observer shall be at least 15 feet, but not more than 0.25 mile, away from each stationary vent during the observation. For outdoor locations, the observer shall select a position where the sun is not directly in the observer's eyes. When condensed water vapor is present within the plume, as it emerges from the emissions outlet, observations must be made beyond the point in the plume at which condensed water vapor is no longer visible. When water vapor within the plume condenses and becomes visible at a distance from the emissions outlet, the observation shall be evaluated at the outlet prior to condensation of water vapor. A certified opacity reader is not required for visible emissions observations.
- (5) Compliance Certification:
 - (a) If visible emissions are not present during the observation, the RO may certify that the source is in compliance with the applicable opacity requirement in 30 TAC § 111.111(a)(1) and (a)(1)(B).
 - (b) However, if visible emissions are present during the observation, the permit holder shall either list this occurrence as a deviation on the next deviation report as required under 30 TAC § 122.145(2) or conduct the appropriate opacity test specified in 30 TAC § 111.111(a)(1)(F) as soon as practicable, but no later than 24 hours after observing visible emissions to determine if the source is in compliance with the opacity requirements. If an opacity test is performed and the

source is determined to be in compliance, the RO may certify that the source is in compliance with the applicable opacity requirement. However, if an opacity test is performed and the source is determined to be out of compliance, the permit holder shall list this occurrence as a deviation on the next deviation report as required under 30 TAC § 122.145(2). The opacity test must be performed by a certified opacity reader.

- (c) Some vents may be subject to multiple visible emission or monitoring requirements. All credible data must be considered when certifying compliance with this requirement even if the observation or monitoring was performed to demonstrate compliance with a different requirement.

B. For visible emissions from a building, enclosed facility, or other structure; the permit holder shall comply with the following requirements:

- (i) Title 30 TAC § 111.111(a)(7)(A) (relating to Requirements for Specified Sources)
- (ii) Title 30 TAC § 111.111(a)(7)(B)(i) or (ii)
- (iii) For a building containing an air emission source, enclosed facility, or other structure containing or associated with an air emission source subject to 30 TAC § 111.111(a)(7)(A), complying with 30 TAC § 111.111(a)(7)(B)(i) or (ii), and capable of producing visible emissions from, but not limited to, particulate matter, acid gases and NO_x, the permit holder shall also comply with the following periodic monitoring requirements for the purpose of annual compliance certification under 30 TAC § 122.146:
 - (1) An observation of visible emissions from a building containing an air emission source, enclosed facility, or other structure containing or associated with an air emission source which is required to comply with 30 TAC § 111.111(a)(7)(A) shall be conducted at least once during each calendar quarter unless the air emission source or enclosed facility is not operating for the entire quarter.
 - (2) Records of all observations shall be maintained.
 - (3) Visible emissions observations of air emission sources or enclosed facilities operated during daylight hours shall be conducted no earlier than one hour after sunrise and no later than one hour before sunset. Visible emissions observations of air emission sources or enclosed facilities operated only at night must be made with additional lighting and the temporary installation of contrasting backgrounds. Visible emissions shall be determined with each emissions outlet in clear view of the observer. The observer shall be at least 15 feet, but not more than 0.25 mile, away from each emissions outlet during the observation. For outdoor locations, the observer shall select a

position where the sun is not directly in the observer's eyes. When condensed water vapor is present within the plume, as it emerges from the emissions outlet, observations must be made beyond the point in the plume at which condensed water vapor is no longer visible. When water vapor within the plume condenses and becomes visible at a distance from the emissions outlet, the observation shall be evaluated at the outlet prior to condensation of water vapor. A certified opacity reader is not required for visible emissions observations.

(4) Compliance Certification:

- (a) If visible emissions are not present during the observation, the RO may certify that the source is in compliance with the applicable opacity requirement in 30 TAC § 111.111(a)(7) and (a)(7)(A)
- (b) However, if visible emissions are present during the observation, the permit holder shall either list this occurrence as a deviation on the next deviation report as required under 30 TAC § 122.145(2) or conduct the appropriate opacity test specified in 30 TAC § 111.111(a)(7)(B) as soon as practicable, but no later than 24 hours after observing visible emissions to determine if the source is in compliance with the opacity requirements. If an opacity test is performed and the source is determined to be in compliance, the RO may certify that the source is in compliance with the applicable opacity requirement. However, if an opacity test is performed and the source is determined to be out of compliance, the permit holder shall list this occurrence as a deviation on the next deviation report as required under 30 TAC § 122.145(2). The opacity test must be performed by a certified opacity reader

C. For visible emissions from all other sources not specified in 30 TAC § 111.111(a)(1), (4), or (7); the permit holder shall comply with the following requirements:

- (i) Title 30 TAC § 111.111(a)(8)(A) (relating to Requirements for Specified Sources)
- (ii) Title 30 TAC § 111.111(a)(8)(B)(i) or (ii)
- (iii) For a source subject to 30 TAC § 111.111(a)(8)(A), complying with 30 TAC § 111.111(a)(8)(B)(i) or (ii), and capable of producing visible emissions from, but not limited to, particulate matter, acid gases and NO_x, the permit holder shall also comply with the following periodic monitoring requirements for the purpose of annual compliance certification under 30 TAC § 122.146:
 - (1) An observation of visible emissions from a source which is required to comply with 30 TAC § 111.111(a)(8)(A) shall be

conducted at least once during each calendar quarter unless the source is not operating for the entire quarter.

- (2) Records of all observations shall be maintained.
- (3) Visible emissions observations of sources operated during daylight hours shall be conducted no earlier than one hour after sunrise and no later than one hour before sunset. Visible emissions observations of sources operated only at night must be made with additional lighting and the temporary installation of contrasting backgrounds. Visible emissions shall be determined with each source in clear view of the observer. The observer shall be at least 15 feet, but not more than 0.25 mile, away from each source during the observation. For outdoor locations, the observer shall select a position where the sun is not directly in the observer's eyes. When condensed water vapor is present within the plume, as it emerges from the emissions outlet, observations must be made beyond the point in the plume at which condensed water vapor is no longer visible. When water vapor within the plume condenses and becomes visible at a distance from the emissions outlet, the observation shall be evaluated at the outlet prior to condensation of water vapor. A certified opacity reader is not required for visible emissions observations.
- (4) Compliance Certification:
 - (a) If visible emissions are not present during the observation, the RO may certify that the source is in compliance with the applicable opacity requirement in 30 TAC § 111.111(a)(8) and (a)(8)(A)
 - (b) However, if visible emissions are present during the observation, the permit holder shall either list this occurrence as a deviation on the next deviation report as required under 30 TAC § 122.145(2) or conduct the appropriate opacity test specified in 30 TAC § 111.111(a)(8)(B) as soon as practicable, but no later than 24 hours after observing visible emissions to determine if the source is in compliance with the opacity requirements. If an opacity test is performed and the source is determined to be in compliance, the RO may certify that the source is in compliance with the applicable opacity requirement. However, if an opacity test is performed and the source is determined to be out of compliance, the permit holder shall list this occurrence as a deviation on the next deviation report as required under 30 TAC § 122.145(2). The opacity test must be performed by a certified opacity reader.

- D. Certification of opacity readers determining opacities under Method 9 (as outlined in 40 CFR Part 60, Appendix A) to comply with opacity monitoring requirements shall be accomplished by completing the Visible Emissions Evaluators Course, or approved agency equivalent, no more than 180 days before the opacity reading.

- E. For emission units with contributions from uncombined water, the permit holder shall comply with the requirements of 30 TAC § 111.111(b).
 - F. Emission limits on nonagricultural processes, except for the steam generators specified in 30 TAC § 111.153, shall comply with the following requirements:
 - (i) Emissions of PM from any source may not exceed the allowable rates as required in 30 TAC § 111.151(a) (relating to Allowable Emissions Limits)
 - (ii) Sources with an effective stack height (h_e) less than the standard effective stack height (H_e), must reduce the allowable emission level by multiplying it by $[h_e/H_e]^2$ as required in 30 TAC § 111.151(b)
 - (iii) Effective stack height shall be calculated by the equation specified in 30 TAC § 111.151(c)
 - G. Outdoor burning, as stated in 30 TAC § 111.201, shall not be authorized unless the following requirements are satisfied:
 - (i) Title 30 TAC § 111.205 (relating to Exception for Fire Training)
 - (ii) Title 30 TAC § 111.207 (relating to Exception for Recreation, Ceremony, Cooking, and Warmth)
 - (iii) Title 30 TAC § 111.219 (relating to General Requirements for Allowable Outdoor Burning)
 - (iv) Title 30 TAC § 111.221 (relating to Responsibility for Consequences of Outdoor Burning)
4. Permit holder shall comply with the following 30 TAC Chapter 115, Subchapter C requirements:
- A. When filling gasoline storage vessels with a nominal capacity greater than 1,000 gallons (Stage I) at motor vehicle fuel dispensing facilities, which have dispensed less than 125,000 gallons of gasoline in any calendar month after January 1, 1999, the permit holder shall comply with the following requirements specified in 30 TAC Chapter 115, Subchapter C:
 - (i) Title 30 TAC § 115.222(7) (relating to Control Requirements)
 - (ii) Title 30 TAC § 115.222(3), as it applies to liquid gasoline leaks
 - (iii) Title 30 TAC § 115.224(1) (relating to Inspection Requirements), as it applies to liquid gasoline leaks
 - (iv) Title 30 TAC § 115.226(2)(C) (relating to Recordkeeping Requirements)
5. The permit holder shall comply with the requirements of 30 TAC Chapter 113, Subchapter C, § 113.100 for units subject to any subpart of 40 CFR Part 63, unless otherwise stated in the applicable subpart.

Additional Monitoring Requirements

6. Unless otherwise specified, the permit holder shall comply with the compliance assurance monitoring requirements as specified in the attached “CAM Summary” upon issuance of the permit. In addition, the permit holder shall comply with the following:
 - A. The permit holder shall comply with the terms and conditions contained in 30 TAC § 122.147 (General Terms and Conditions for Compliance Assurance Monitoring).
 - B. The permit holder shall report, consistent with the averaging time identified in the “CAM Summary,” deviations as defined by the deviation limit in the “CAM Summary.” Any monitoring data below a minimum limit or above a maximum limit, that is collected in accordance with the requirements specified in 40 CFR § 64.7(c), shall be reported as a deviation. Deviations shall be reported according to 30 TAC § 122.145 (Reporting Terms and Conditions).
 - C. The permit holder may elect to collect monitoring data on a more frequent basis and average the data, consistent with the averaging time specified in the “CAM Summary,” for purposes of determining whether a deviation has occurred. However, the additional data points must be collected on a regular basis. In no event shall data be collected and used in particular instances in order to avoid reporting deviations. All monitoring data shall be collected in accordance with the requirements specified in 40 CFR § 64.7(c).
 - D. The permit holder shall operate the monitoring, identified in the attached “CAM Summary,” in accordance with the provisions of 40 CFR § 64.7.
 - E. The permit holder shall comply with either of the following requirements for any particulate matter capture system associated with the control device subject to CAM. If the results of the following inspections indicate that the capture system is not working properly, the permit holder shall promptly take necessary corrective action:
 - (i) Once per year the permit holder shall inspect any fan for proper operation and inspect the capture system used in compliance of CAM for cracks, holes, tears, and other defects; or
 - (ii) Once per year, the permit holder shall inspect for fugitive emissions escaping from the capture system in compliance of CAM by performing a visible emissions observation for a period of at least six minutes in accordance with 40 CFR Part 60, Appendix A, Test Method 22.
 - F. The permit holder shall comply with the requirements of 40 CFR § 70.6(a)(3)(ii)(A) and 30 TAC § 122.144(1)(A)-(F) for documentation of all required inspections.

New Source Review Authorization Requirements

7. Permit holder shall comply with the requirements of New Source Review authorizations issued or claimed by the permit holder for the permitted area, including permits, permits by rule, standard permits, flexible permits, special permits, permits for existing facilities including Voluntary Emissions Reduction Permits and Electric Generating Facility Permits issued under 30 TAC Chapter 116, Subchapter I, or special exemptions

referenced in the New Source Review Authorization References attachment. These requirements:

- A. Are incorporated by reference into this permit as applicable requirements
 - B. Shall be located with this operating permit
 - C. Are not eligible for a permit shield
8. The permit holder shall comply with the general requirements of 30 TAC Chapter 106, Subchapter A or the general requirements, if any, in effect at the time of the claim of any PBR.
9. The permit holder shall maintain records to demonstrate compliance with any emission limitation or standard that is specified in a permit by rule (PBR) or Standard Permit listed in the New Source Review Authorizations attachment. The records shall yield reliable data from the relevant time period that are representative of the emission unit's compliance with the PBR or Standard Permit. These records may include, but are not limited to, production capacity and throughput, hours of operation, safety data sheets (SDS), chemical composition of raw materials, speciation of air contaminant data, engineering calculations, maintenance records, fugitive data, performance tests, capture/control device efficiencies, direct pollutant monitoring (CEMS, COMS, or PEMS), or control device parametric monitoring. These records shall be made readily accessible and available as required by 30 TAC § 122.144. Any monitoring or recordkeeping data indicating noncompliance with the PBR or Standard Permit shall be considered and reported as a deviation according to 30 TAC § 122.145 (Reporting Terms and Conditions).

Compliance Requirements

10. The permit holder shall certify compliance in accordance with 30 TAC § 122.146. The permit holder shall comply with 30 TAC § 122.146 using at a minimum, but not limited to, the continuous or intermittent compliance method data from monitoring, recordkeeping, reporting, or testing required by the permit and any other credible evidence or information. The certification period may not exceed 12 months and the certification must be submitted within 30 days after the end of the period being certified.
11. Use of Discrete Emission Credits to comply with the applicable requirements:
- A. Unless otherwise prohibited, the permit holder may use discrete emission credits to comply with the following applicable requirements listed elsewhere in this permit:
 - (i) Title 30 TAC Chapter 115
 - (ii) Title 30 TAC Chapter 117
 - (iii) If applicable, offsets for Title 30 TAC Chapter 116
 - (iv) Temporarily exceed state NSR permit allowables
 - B. The permit holder shall comply with the following requirements in order to use the credit to comply with the applicable requirements:

- (i) The permit holder must notify the TCEQ according to 30 TAC § 101.376(d)
- (ii) The discrete emission credits to be used must meet all the geographic, timeliness, applicable pollutant type, and availability requirements listed in 30 TAC Chapter 101, Subchapter H, Division 4
- (iii) The executive director has approved the use of the discrete emission credits according to 30 TAC § 101.376(d)(1)(A)
- (iv) The permit holder keeps records of the use of credits towards compliance with the applicable requirements in accordance with 30 TAC § 101.372(h) and 30 TAC Chapter 122

Protection of Stratospheric Ozone

- 12. Permit holders at a site subject to Title VI of the FCAA Amendments shall meet the following requirements for protection of stratospheric ozone.
 - A. Any on site servicing, maintenance, and repair on refrigeration and nonmotor vehicle air-conditioning appliances using ozone-depleting refrigerants or non-exempt substitutes shall be conducted in accordance with 40 CFR Part 82, Subpart F. Permit holders shall ensure that repairs on or refrigerant removal from refrigeration and nonmotor vehicle air-conditioning appliances using ozone-depleting refrigerants are performed only by properly certified technicians using certified equipment. Records shall be maintained as required by 40 CFR Part 82, Subpart F.

Permit Location

- 13. The permit holder shall maintain a copy of this permit and records related to requirements listed in this permit on site.

Permit Shield (30 TAC § 122.148)

- 14. A permit shield is granted for the emission units, groups, or processes specified in the attached "Permit Shield." Compliance with the conditions of the permit shall be deemed compliance with the specified potentially applicable requirements or specified potentially applicable state-only requirements listed in the attachment "Permit Shield." Permit shield provisions shall not be modified by the executive director until notification is provided to the permit holder. No later than 90 days after notification of a change in a determination made by the executive director, the permit holder shall apply for the appropriate permit revision to reflect the new determination. Provisional terms are not eligible for this permit shield. Any term or condition, under a permit shield, shall not be protected by the permit shield if it is replaced by a provisional term or condition or the basis of the term and condition changes.

Attachments

Applicable Requirements Summary

Additional Monitoring Requirements

Permit Shield

New Source Review Authorization References

Applicable Requirements Summary

Unit Summary 14

Applicable Requirements Summary 15

Note: A “none” entry may be noted for some emission sources in this permit’s “Applicable Requirements Summary” under the heading of “Monitoring and Testing Requirements” and/or “Recordkeeping Requirements” and/or “Reporting Requirements.” Such a notation indicates that there are no requirements for the indicated emission source as identified under the respective column heading(s) for the stated portion of the regulation when the emission source is operating under the conditions of the specified SOP Index Number. However, other relevant requirements pursuant to 30 TAC Chapter 122 including Recordkeeping Terms and Conditions (30 TAC § 122.144), Reporting Terms and Conditions (30 TAC § 122.145), and Compliance Certification Terms and Conditions (30 TAC § 122.146) continue to apply.

Unit Summary

Unit/Group/ Process ID No.	Unit Type	Group/Inclusive Units	SOP Index No.	Regulation	Requirement Driver
BLR-22	EMISSION POINTS/STATIONARY VENTS/PROCESS VENTS	N/A	R111-1	30 TAC Chapter 111, Nonagricultural Processes	No changing attributes.
BLR-22	BOILERS/STEAM GENERATORS/STEAM GENERATING UNITS	N/A	63DDDDD-01	40 CFR Part 63, Subpart DDDDD	No changing attributes.
FIREPMP	SRIC ENGINES	N/A	63ZZZZ-1	40 CFR Part 63, Subpart ZZZZ	No changing attributes.
GRPSAWM1-5	PLYWOOD AND COMPOSITE WOOD PRODUCTS	KLN-101, KLN-102, KLN-103, KLN-104, KLN-130	63DDDD-1	40 CFR Part 63, Subpart DDDD	No changing attributes.
GRPSTUDM1-2	PLYWOOD AND COMPOSITE WOOD PRODUCTS	KLN-91, KLN-92	63DDDD-1	40 CFR Part 63, Subpart DDDD	No changing attributes.
SHBF-105	EMISSION POINTS/STATIONARY VENTS/PROCESS VENTS	N/A	R111-1	30 TAC Chapter 111, Nonagricultural Processes	No changing attributes.

Applicable Requirements Summary

Unit Group Process ID No.	Unit Group Process Type	SOP Index No.	Pollutant	State Rule or Federal Regulation Name	Emission Limitation, Standard or Equipment Specification Citation	Textual Description (See Special Term and Condition 1.B.)	Monitoring And Testing Requirements	Recordkeeping Requirements (30 TAC § 122.144)	Reporting Requirements (30 TAC § 122.145)
BLR-22	EP	R111-1	PM	30 TAC Chapter 111, Nonagricultural Processes	§ 111.151(a) § 111.151(c)	No person may cause, suffer, allow, or permit emissions of particulate matter from any source to exceed the allowable rates specified in Table 1 as follows, except as provided by §111.153 of this title (relating to Emissions Limits for Steam Generators).	** See CAM Summary	None	None
BLR-22	EU	63DDDD D-01	112(B) HAPS	40 CFR Part 63, Subpart DDDDD	§ 63.7505 The permit holder shall comply with the applicable limitation, standard and/or equipment specification requirements of 40 CFR Part 63, Subpart DDDDD	The permit holder shall comply with the applicable requirements of 40 CFR Part 63, Subpart DDDDD	The permit holder shall comply with the applicable monitoring and testing requirements of 40 CFR Part 63, Subpart DDDDD	The permit holder shall comply with the applicable recordkeeping requirements of 40 CFR Part 63, Subpart DDDDD	The permit holder shall comply with the applicable reporting requirements of 40 CFR Part 63, Subpart DDDDD
FIREPMP	EU	63ZZZZ-1	112(B) HAPS	40 CFR Part 63, Subpart ZZZZ	§ 63.6602-Table2c.1 § 63.6595(a)(1) § 63.6605(a) § 63.6605(b) § 63.6625(e) § 63.6625(h) § 63.6625(i) § 63.6640(b) § 63.6640(f)(1) [G]§ 63.6640(f)(2) § 63.6640(f)(3)	For each existing emergency stationary CI RICE and black start stationary CI RICE, located at a major source, you must comply with the requirements as specified in Table 2c.1.a-c.	§ 63.6625(f) § 63.6625(i) § 63.6640(a) § 63.6640(a)-Table6.9.a.i § 63.6640(a)-Table6.9.a.ii § 63.6640(b)	§ 63.6625(i) § 63.6655(a) § 63.6655(a)(1) § 63.6655(a)(2) § 63.6655(a)(4) § 63.6655(a)(5) § 63.6655(d) § 63.6655(e) § 63.6655(e)(2) § 63.6655(f) § 63.6660(a) § 63.6660(b) § 63.6660(c)	§ 63.6640(b) § 63.6640(e) § 63.6650(f)

Applicable Requirements Summary

Unit Group Process ID No.	Unit Group Process Type	SOP Index No.	Pollutant	State Rule or Federal Regulation Name	Emission Limitation, Standard or Equipment Specification Citation	Textual Description (See Special Term and Condition 1.B.)	Monitoring And Testing Requirements	Recordkeeping Requirements (30 TAC § 122.144)	Reporting Requirements (30 TAC § 122.145)
GRPSAWM1-5	EU	63DDDD-1	112(B) HAPS	40 CFR Part 63, Subpart DDDD	§ 63.2252	For process units not subject to the compliance options or work practice requirements specified in §63.2240 (including, but not limited to, lumber kilns), you are not required to comply with the compliance options, work practice requirements, performance testing, monitoring, SSM plans, and recordkeeping or reporting requirements of this subpart, or any other requirements in subpart A of this part, except for the initial notification requirements in §63.9(b).	None	None	§ 63.2252
GRPSTUDM1-2	EU	63DDDD-1	112(B) HAPS	40 CFR Part 63, Subpart DDDD	§ 63.2252	For process units not subject to the compliance options or work practice requirements specified in §63.2240 (including, but not limited to, lumber kilns), you are not required to comply with the compliance options, work practice requirements, performance testing, monitoring, SSM plans, and recordkeeping or reporting requirements of this subpart, or any	None	None	§ 63.2252

Applicable Requirements Summary

Unit Group Process ID No.	Unit Group Process Type	SOP Index No.	Pollutant	State Rule or Federal Regulation Name	Emission Limitation, Standard or Equipment Specification Citation	Textual Description (See Special Term and Condition 1.B.)	Monitoring And Testing Requirements	Recordkeeping Requirements (30 TAC § 122.144)	Reporting Requirements (30 TAC § 122.145)
						other requirements in subpart A of this part, except for the initial notification requirements in §63.9(b).			
SHBF-105	EP	R111-1	PM	30 TAC Chapter 111, Nonagricultural Processes	§ 111.151(a) § 111.151(c)	No person may cause, suffer, allow, or permit emissions of particulate matter from any source to exceed the allowable rates specified in Table 1 as follows, except as provided by §111.153 of this title (relating to Emissions Limits for Steam Generators).	** See CAM Summary	None	None

Additional Monitoring Requirements

Compliance Assurance Monitoring Summary 19

CAM Summary

Unit/Group/Process Information	
ID No.: BLR-22	
Control Device ID No.: SCR-22	Control Device Type: Wet or Dry Electrostatic Precipitator
Applicable Regulatory Requirement	
Name: 30 TAC Chapter 111, Nonagricultural Processes	SOP Index No.: R111-1
Pollutant: PM	Main Standard: § 111.151(a)
Monitoring Information	
Indicator: Secondary Voltage	
Minimum Frequency: once per day	
Averaging Period: n/a*	
Deviation Limit: Minimum secondary voltage = 15 KVDC (avg. of two ESP fields). Measurements < minimum shall be reported as a deviation.	
CAM Text: Each monitoring device shall be calibrated at a frequency in accordance with the manufacturer's specifications, other written procedures that provide an adequate assurance that the device is calibrated accurately, or at least annually, whichever is more frequent, and shall be accurate to within one of the following: ± 2% of reading; or ± 5% over its operating range.	

*The permit holder may elect to collect monitoring data on a more frequent basis and calculate the average as specified by the minimum frequency, for purposes of determining whether a deviation has occurred. However, the additional data points must be collected on a regular basis and shall not be collected and used in particular instances to avoid reporting deviations.

CAM Summary

Unit/Group/Process Information	
ID No.: BLR-22	
Control Device ID No.: SCR-22	Control Device Type: Wet or Dry Electrostatic Precipitator
Applicable Regulatory Requirement	
Name: 30 TAC Chapter 111, Nonagricultural Processes	SOP Index No.: R111-1
Pollutant: PM	Main Standard: § 111.151(a)
Monitoring Information	
Indicator: Secondary Current	
Minimum Frequency: once per day	
Averaging Period: n/a*	
Deviation Limit: Minimum secondary current (SC) = 100 mADC (avg. of two ESP fields); Maximum SC = 600 mADC (avg. of two ESP fields). Measurements less than the minimum or greater than the maximum shall be reported as a deviation.	
<p>CAM Text: Each monitoring device shall be calibrated at a frequency in accordance with the manufacturer's specifications, other written procedures that provide an adequate assurance that the device is calibrated accurately, or at least annually, whichever is more frequent, and shall be accurate to within one of the following:</p> <ul style="list-style-type: none"> ± 1% of reading; or ± 5% over its operating range. 	

*The permit holder may elect to collect monitoring data on a more frequent basis and calculate the average as specified by the minimum frequency, for purposes of determining whether a deviation has occurred. However, the additional data points must be collected on a regular basis and shall not be collected and used in particular instances to avoid reporting deviations.

CAM Summary

Unit/Group/Process Information	
ID No.: SHBF-105	
Control Device ID No.: BAG-105	Control Device Type: Fabric Filter
Applicable Regulatory Requirement	
Name: 30 TAC Chapter 111, Nonagricultural Processes	SOP Index No.: R111-1
Pollutant: PM	Main Standard: § 111.151(a)
Monitoring Information	
Indicator: Pressure Drop	
Minimum Frequency: once per day	
Averaging Period: n/a*	
Deviation Limit: Minimum pressure drop = 0.1 in. water; Maximum pressure drop = 5 in. water. Measurements < minimum or > maximum shall be reported as a deviation.	
<p>CAM Text: Each monitoring device shall be calibrated at a frequency in accordance with the manufacturer's specifications, other written procedures that provide an adequate assurance that the device is calibrated accurately, or at least annually, whichever is more frequent, and shall be accurate to within one of the following:</p> <ul style="list-style-type: none"> ± 0.5 inches water gauge pressure (± 125 pascals); or ± 0.5% of span. 	

*The permit holder may elect to collect monitoring data on a more frequent basis and calculate the average as specified by the minimum frequency, for purposes of determining whether a deviation has occurred. However, the additional data points must be collected on a regular basis and shall not be collected and used in particular instances to avoid reporting deviations.

Permit Shield

Permit Shield 23

Permit Shield

The Executive Director of the TCEQ has determined that the permit holder is not required to comply with the specific regulation(s) identified for each emission unit, group, or process in this table.

Unit/Group/Process		Regulation	Basis of Determination
ID No.	Group/Inclusive Units		
BLR-22	N/A	40 CFR Part 60, Subpart D	Heat input<250 MMBtu/hr.
BLR-22	N/A	40 CFR Part 60, Subpart Db	Constructed prior to 6/19/84.
BLR-22	N/A	40 CFR Part 60, Subpart Dc	Constructed prior to 6/9/89.
DSLTK-01	N/A	40 CFR Part 60, Subpart Kb	The capacity of this tank is less than 75 cubic meters (19,800 gallons).
FIREPMP	N/A	40 CFR Part 60, Subpart IIII	Unit is a stationary CI ICE that commenced construction (i.e., was ordered) prior to July 11, 2005 and has not been modified or reconstructed since July 11, 2005.
GAS-U-01	N/A	30 TAC Chapter 115, Loading and Unloading of VOC	Motor vehicle fuel dispensing facility.

New Source Review Authorization References

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New Source Review Authorization References by Emission Unit	26

New Source Review Authorization References

The New Source Review authorizations listed in the table below are applicable requirements under 30 TAC Chapter 122 and enforceable under this operating permit.

Prevention of Significant Deterioration (PSD) Permits	
PSD Permit No.: PSDTX924M2	Issuance Date: 06/19/2015
Title 30 TAC Chapter 116 Permits, Special Permits, and Other Authorizations (Other Than Permits By Rule, PSD Permits, or NA Permits) for the Application Area.	
Authorization No.: 1037	Issuance Date: 06/19/2015
Permits By Rule (30 TAC Chapter 106) for the Application Area	
Number: 106.183	Version No./Date: 09/04/2000
Number: 106.227	Version No./Date: 09/04/2000
Number: 106.261	Version No./Date: 11/01/2003
Number: 106.263	Version No./Date: 11/01/2001
Number: 106.265	Version No./Date: 09/04/2000
Number: 106.321	Version No./Date: 09/04/2000
Number: 106.371	Version No./Date: 09/04/2000
Number: 106.392	Version No./Date: 09/04/2000
Number: 106.412	Version No./Date: 09/04/2000
Number: 106.433	Version No./Date: 09/04/2000
Number: 106.454	Version No./Date: 11/01/2001
Number: 106.472	Version No./Date: 09/04/2000
Number: 106.473	Version No./Date: 09/04/2000
Number: 106.476	Version No./Date: 09/04/2000
Number: 106.511	Version No./Date: 09/04/2000
Number: 106.532	Version No./Date: 09/04/2000

New Source Review Authorization References by Emissions Unit

The following is a list of New Source Review (NSR) authorizations for emission units listed elsewhere in this operating permit. The NSR authorizations are applicable requirements under 30 TAC Chapter 122 and enforceable under this operating permit.

Unit/Group/Process ID No.	Emission Unit Name/Description	New Source Review Authorization
BLR-22	WOOD-FIRED BOILER	1037, PSDTX924M2
DSLTK-01	DIESEL TANK	106.472/09/04/2000
FIREPMP	FIREWATER PUMP STATIONARY DIESEL ENGINE	106.511/09/04/2000
GAS-U-01	GASOLINE UNLOADING	106.412/09/04/2000
KLN-101	SAWMILL DRY KILN NO.1	1037, PSDTX924M2
KLN-102	SAWMILL DRY KILN NO.2	1037, PSDTX924M2
KLN-103	SAWMILL DRY KILN NO.3	1037, PSDTX924M2
KLN-104	SAWMILL DRY KILN NO.4	1037, PSDTX924M2
KLN-130	SAWMILL DRY KILN NO.5	1037, PSDTX924M2
KLN-91	STUDMILL DIRECT-FIRE KILN NO.1	1037, PSDTX924M2
KLN-92	STUDMILL DIRECT-FIRE KILN NO.2	1037, PSDTX924M2
SHBF-105	SHAVINGS BAG FILTER	1037, PSDTX924M2

Alternative Requirements

Alternative Requirements	28
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Bryan W. Shaw, Ph.D., P.E., *Chairman*
Toby Baker, *Commissioner*
Zak Covar, *Commissioner*
Richard A. Hyde, P.E., *Executive Director*



TEXAS COMMISSION ON ENVIRONMENTAL QUALITY
Protecting Texas by Reducing and Preventing Pollution

October 24, 2014

MR TRACY SMITH
PINELAND TX LUMBER MILL MANAGER
GEORGIA-PACIFIC WOOD PRODUCTS SOUTH LLC
PO BOX 929
PINELAND TX 75968-0929

Re: Permit Alteration
Permit Numbers: 1037 and PSDTX924M2
Renewal Date: November 10, 2019
Georgia-Pacific Wood Products South LLC
Lumber Mill
Pineland, Sabine County
Regulated Entity Number: RN100217744
Customer Reference Number: CN603181850
Account Number: SA-0005-N

Dear Mr. Smith:

This is in response to your letter received August 11, 2014, requesting an extension of one year to comply with the requirements in Title 40 Code of Federal Regulations (40 CFR) Part 63, Subpart DDDDD for your Wood-Fired Boiler (Emission Point Number [EPN]-22). In your letter, you indicated that the requested one-year extension is necessary to develop the correct compliance approach and monitoring system for the affected unit(s) based on the requirements and standards of the Boiler MACT rule. Based on the information provided, you are hereby granted a one-year extension from January 31, 2016 to January 31, 2017 to comply with the requirements in 40 CFR Part 63, Subpart DDDDD.

You are reminded that these facilities must be in compliance with all rules and regulations of the Texas Commission on Environmental Quality (TCEQ) and of the U.S. Environmental Protection Agency at all times.

In addition, item numbers 1 through 4 below are conditions of the compliance extension approval.

Affected Facilities

1. The Wood-Fired Boiler is the source affected by this extension. The extension request applies to all emission limits, work practices, standards, initial performance testing, site-specific monitoring plans, record keeping and reporting and all other requirements specified by 40 CFR Part 63, Subpart DDDDD as referenced in 30 TAC Chapter 113.1130.

P.O. Box 13087 • Austin, Texas 78711-3087 • 512-239-1000 • tceq.texas.gov

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Mr. Tracy Smith
Page 2
October 24, 2014

Re: Permit Numbers: 1037 and PSDTX924M2

Support for Compliance Schedule

2. Georgia-Pacific has proposed the following alternate compliance schedule based upon receiving a one-year extension:

Table 1: Modification Project And Compliance Schedule

Modification Project	Compliance Schedule
Boiler performance evaluation	Complete
Boiler emissions measurements (baseline)	Complete
Evaluation of lumber drying technology	June 1, 2015
Initiate project design	November 1, 2015
Complete project design	April 18, 2016
Start construction	April 19, 2016
Complete construction	July 13, 2016
Optimization, testing and tuning	January 8, 2017
Achieve compliance	January 9, 2017

The compliance schedule takes into consideration the construction schedule to install additional pollution controls on EPN-22.

Notification and Other Requirements

3. Georgia-Pacific shall submit a notification to the TCEQ and the U.S. Environmental Protection Agency (EPA) Region 6, postmarked within 30 days of the date compliance was achieved, specifying the new compliance date and detailing the affected site and equipment. All monitoring, performance testing, recordkeeping, and reporting required by the applicable standards in Subpart DDDDD must begin on the new compliance date, or where time frames in the standards are established from the compliance date, must be based on the new compliance date.

The notification required in this condition should be directed to:

Air Section Manager
TCEQ Region 10
3870 Eastex Fwy
Beaumont, Texas 77703-1830

With Copies To:

Texas Commission on Environmental Quality
Air Permits Division, MC-163
Mr. Patrick Agumadu
P.O. Box 13087
Austin, Texas 78711-3087

Mr. Tracy Smith
Page 3
October 24, 2014

Re: Permit Numbers: 1037 and PSDTX924M2

U.S. Environmental Protection Agency

Region 6
Attn: Air Permits Section (6PD-R)
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202-2733

4. This compliance extension may be terminated, or additional requirements imposed, at any time the TCEQ or EPA determines that Georgia-Pacific is not making reasonable efforts to comply consistent with the compliance extension application or the sources requesting extension are found to not be in compliance with currently applicable permits or other applicable State or Federal rules.

Pursuant to 40 CFR § 63.6(i)(4)(i)(A), you are required to apply for a revision of the affected source's Title V permit (Permit Number O2407) to incorporate the conditions of this compliance extension.

These changes have been reviewed and the permit file has been updated. Please attach this letter to your permit.

The TCEQ appreciates your attention to the changing applicable rule requirements. If you need further information or have any questions, please contact Mr. Patrick Agumadu, P.E. at (512) 239-1271 or write to the Texas Commission on Environmental Quality, Office of Air, Air Permits Division, MC-163, P.O. Box 13087, Austin, Texas 78711-3087.

This action is taken under authority delegated by the Executive Director of TCEQ.

Sincerely,



Michael Wilson, P.E., Director
Air Permits Division
Office of Air
Texas Commission on Environmental Quality

MPW/pna

Enclosure

cc: Air Section Manager, Region 10 - Beaumont
Air Permits Section Chief, New Source Review Section (6PD-R), U.S. Environmental
Protection Agency, Region 6, Dallas

Project Number: 217580

Appendix A

Acronym List	32
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Acronym List

The following abbreviations or acronyms may be used in this permit:

ACFM	actual cubic feet per minute
AMOC	alternate means of control
ARP	Acid Rain Program
ASTM	American Society of Testing and Materials
B/PA	Beaumont/Port Arthur (nonattainment area)
CAM	Compliance Assurance Monitoring
CD	control device
COMS	continuous opacity monitoring system
CVS	closed-vent system
D/FW	Dallas/Fort Worth (nonattainment area)
DR	Designated Representative
ELP	El Paso (nonattainment area)
EP	emission point
EPA	U.S. Environmental Protection Agency
EU	emission unit
FCAA Amendments	Federal Clean Air Act Amendments
FOP	federal operating permit
GF	grandfathered
gr/100 scf	grains per 100 standard cubic feet
HAP	hazardous air pollutant
H/G/B	Houston/Galveston/Brazoria (nonattainment area)
H ₂ S	hydrogen sulfide
ID No.	identification number
lb/hr	pound(s) per hour
MMBtu/hr	Million British thermal units per hour
MRRT	monitoring, recordkeeping, reporting, and testing
NA	nonattainment
N/A	not applicable
NADB	National Allowance Data Base
NO _x	nitrogen oxides
NSPS	New Source Performance Standard (40 CFR Part 60)
NSR	New Source Review
ORIS	Office of Regulatory Information Systems
Pb	lead
PBR	Permit By Rule
PM	particulate matter
ppmv	parts per million by volume
PSD	prevention of significant deterioration
RO	Responsible Official
SO ₂	sulfur dioxide
TCEQ	Texas Commission on Environmental Quality
TSP	total suspended particulate
TVP	true vapor pressure
U.S.C.	United States Code
VOC	volatile organic compound

Appendix B

Major NSR Summary Table	34
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Major NSR Summary Table

Permit Number: 1037/PSDTX924M2					Issuance Date: 06/19/2015		
Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates (6)		Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
			lb/hr	TPY**(4)	Spec. Cond.	Spec. Cond.	Spec. Cond.
21A	Boiler Fuel House (5)	PM	0.08	0.30	9, 26	26	
		PM ₁₀	0.04	0.15			
22	Wood-Fired Boiler ESP Stack	VOC	10.25	37.44	5, 24, 28, 32, 35, 36, 37	32, 36, 37, 38	29, 30, 31, 33, 34, 36
		NO _x	30.75	112.31			
		SO ₂	0.16	0.60			
		PM	10.71	39.08			
		PM ₁₀	10.71	39.08			
		CO	246.68	900.96			
22 (MSS)	Wood-Fired Boiler ESP Stack - MSS	VOC	1.00	0.01	37	38	
		NO _x	3.10	0.02			
		SO ₂	0.73	<0.01			
		PM	15.32	0.08			
		PM ₁₀	15.32	0.08			
		CO	200.03	1.00			
27A	Planer Mill Area Baghouse Vent	PM	0.83	3.62	9, 26	26	
		PM ₁₀	0.83	3.62			
91	Studmill Dry Kiln No. 1 Vents	VOC (7)	19.03	78.09	4, 24, 28, 32, 35, 36	32, 36, 38	3, 29, 30, 31, 33, 34, 36
		NO _x	2.41	9.88			
		SO ₂	0.56	1.77			
		PM	1.43	4.55			
		PM ₁₀	1.43	4.55			
		PM _{2.5}	0.31	1.00			
		CO	12.74	40.43			
		HAPs (8)	1.71	6.99			
91 (MSS) (9)	Studmill Dry Kiln No. 1 - MSS	VOC	0.01	---		38	
		NO _x	0.21	---			
		SO ₂	0.01	---			
		PM	0.01	---			
		PM ₁₀	0.01	---			

Permit Number: 1037/PSDTX924M2

Issuance Date: 06/19/2015

Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates (6)		Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
			lb/hr	TPY**(4)	Spec. Cond.	Spec. Cond.	Spec. Cond.
		PM _{2.5}	0.01	---			
		CO	0.12	---			
92	Studmill Dry Kiln No. 2 Vents	VOC (7)	19.03	78.09	4, 24, 28, 32, 35, 36	32, 36, 38	3, 29, 30, 31, 33, 34, 36
		NO _x	2.41	9.88			
		SO _x	0.56	1.77			
		PM	1.43	4.55			
		PM ₁₀	1.43	4.55			
		PM _{2.5}	0.31	1.00			
		CO	12.74	40.43			
		HAPs (8)	1.71	6.99			
92 (MSS) (9)	Studmill Dry Kiln No. 2 - MSS	VOC	0.01	---		38	
		NO _x	0.21	---			
		SO _x	0.01	---			
		PM	0.01	---			
		PM ₁₀	0.01	---			
		PM _{2.5}	0.01	---			
		CO	0.12	---			
91 and 92 MSS (9)	Studmill Kin Nos. 1 and 2 MSS	VOC	---	0.01		38	
		NO _x	---	0.08			
		SO _x	---	<0.01			
		PM	---	<0.01			
		PM ₁₀	---	<0.01			
		PM _{2.5}	---	<0.01			
		CO	---	0.05			
95	Chipmill Green Chips Cyclone Stack	PM	0.30	1.05	7, 25	25, 38	25
		PM ₁₀	0.30	1.05			
101 (10)	Sawmill Dry Kiln No. 1 Vents	VOC	15.76	65.66	4	38	3
		PM	0.47	1.94			
		PM ₁₀	0.47	1.94			
102 (10)	Sawmill Dry Kiln No. 2 Vents	VOC	15.76	65.66	4	38	3
		PM	0.47	1.94			
		PM ₁₀	0.47	1.94			
103 (10)	Sawmill Dry Kiln No. 3 Vents	VOC	15.76	65.66	4	38	3
		PM	0.47	1.94			

Permit Number: 1037/PSDTX924M2

Issuance Date: 06/19/2015

Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates (6)		Monitoring and Testing Requirements	Recordkeeping Requirements	Reporting Requirements
			lb/hr	TPY**(4)	Spec. Cond.	Spec. Cond.	Spec. Cond.
		PM ₁₀	0.47	1.94			
104 (10)	Sawmill Dry Kiln No. 4 Vents	VOC	15.76	65.66	4	38	3
		PM	0.47	1.94			
		PM ₁₀	0.47	1.94			
105	Shavings Baghouse Stack	PM	1.90	2.92	7, 9, 26, 37	26, 37	
		PM ₁₀	1.90	2.92			
106	Shavings Truck Bin (5)	PM	0.10	0.05	8, 9, 26	26, 38	
		PM ₁₀	0.05	0.02			
107	Sawmill Chip Truck Bin (5)	PM	0.36	0.70	8, 9, 26	26, 38	
		PM ₁₀	0.17	0.33			
109	Sawmill Bark Screen/Hog (5)	PM	0.17	0.23			
		PM ₁₀	0.08	0.11			
110	Chipmill Chip Loading (5)	PM	0.17	0.23	8, 9, 26	26, 38	
		PM ₁₀	0.08	0.11			
111	A & B Sawmill Chip Screens (5)	PM	0.07	0.09	8	38	
		PM ₁₀	0.03	0.04			
112	Studmill Chip Loading (5)	PM	0.06	0.14	8, 9, 26	26, 38	
		PM ₁₀	0.03	0.06			
113A	Studmill Chip Screen (5)	PM	0.06	0.08	8	38	
		PM ₁₀	0.03	0.04			
113B	Studmill Bark Hog (5)	PM	0.05	0.07			
		PM ₁₀	0.02	0.03			
114	Chipmill Chip Screen (5)	PM	0.03	0.12	8	38	
		PM ₁₀	0.02	0.06			
115	Chipmill Bark Hog and Screen (5)	PM	0.02	0.03			
		PM ₁₀	0.01	0.02			
119	Haul Roads (5)	PM	--	23.92			
		PM ₁₀	--	4.66			
130 (10)	Sawmill Dry Kiln No. 5 Vents	VOC	15.76	65.66	4, 24, 28, 32, 35, 36	32, 36, 38	3, 29, 30, 31, 33, 34, 36
		PM	0.47	1.94			
		PM ₁₀	0.47	1.94			

Footnotes:

- (1) Emission point identification - either specific equipment designation or emission point number from plot plan.
- (2) Specific point source name. For fugitive sources, use area name or fugitive source name.
- (3)

VOC	-	volatile organic compounds as defined in Title 30 Texas Administrative Code § 101.1
NO _x	-	total oxides of nitrogen
SO ₂	-	sulfur dioxide
PM	-	total particulate matter, suspended in the atmosphere, including PM ₁₀ and PM _{2.5} , as represented
PM ₁₀	-	total particulate matter equal to or less than 10 microns in diameter, including PM _{2.5} , as represented
PM _{2.5}	-	particulate matter equal to or less than 2.5 microns in diameter
CO	-	carbon monoxide
HAP	-	hazardous air pollutant as listed in § 112(b) of the Federal Clean Air Act or Title 40 Code of Federal Regulations (40 CFR) Part 63, Subpart C
- (4) Compliance with annual emission limits (tons per year) is based on a 12 month rolling period.
- (5) Emission rate is an estimate and is enforceable through compliance with the applicable special condition(s) and permit application representations.
- (6) Planned startup and shutdown emissions are included, as well as planned maintenance activities identified as part of permit alteration issued on March 28, 2013.
- (7) VOC emissions include total HAPs
- (8) HAPs include Acetaldehyde (0.51 tpy), Acrolein (0.19 tpy), Formaldehyde (1.13 tpy), Methanol (5.12 tpy), and propionaldehyde (0.03 tpy) from each Studmill Dry Kiln
- (9) For determination of compliance, annual emissions EPNs 91 MSS and 92 MSS should be summed.
- (10) For determination of compliance, emissions from the five steam-heated Kilns (EPNs 101, 102, 103, 104, and 130) should be summed.



TEXAS COMMISSION ON ENVIRONMENTAL QUALITY
AIR QUALITY PERMIT



A Permit Is Hereby Issued To
Georgia-Pacific Wood Products South LLC
Authorizing the Construction and Operation of
Sawmill And Lumber Manufacturing Plant
Located at **Pineland, Sabine County, Texas**
Latitude 31° 15' 0" Longitude -93° 58' 30"

Permit: 1037 and PSDTX924M2

Amendment Date : June 19, 2015

Expiration Date: November 10, 2019

For the Commission

1. **Facilities** covered by this permit shall be constructed and operated as specified in the application for the permit. All representations regarding construction plans and operation procedures contained in the permit application shall be conditions upon which the permit is issued. Variations from these representations shall be unlawful unless the permit holder first makes application to the Texas Commission on Environmental Quality (commission) Executive Director to amend this permit in that regard and such amendment is approved. [Title 30 Texas Administrative Code 116.116 (30 TAC 116.116)]
2. **Voiding of Permit.** A permit or permit amendment is automatically void if the holder fails to begin construction within 18 months of the date of issuance, discontinues construction for more than 18 months prior to completion, or fails to complete construction within a reasonable time. Upon request, the executive director may grant an 18-month extension. Before the extension is granted the permit may be subject to revision based on best available control technology, lowest achievable emission rate, and netting or offsets as applicable. One additional extension of up to 18 months may be granted if the permit holder demonstrates that emissions from the facility will comply with all rules and regulations of the commission, the intent of the Texas Clean Air Act (TCAA), including protection of the public's health and physical property; and (b)(1) the permit holder is a party to litigation not of the permit holder's initiation regarding the issuance of the permit; or (b)(2) the permit holder has spent, or committed to spend, at least 10 percent of the estimated total cost of the project up to a maximum of \$5 million. A permit holder granted an extension under subsection (b)(1) of this section may receive one subsequent extension if the permit holder meets the conditions of subsection (b)(2) of this section. [30 TAC 116.120(a), (b) and (c)]
3. **Construction Progress.** Start of construction, construction interruptions exceeding 45 days, and completion of construction shall be reported to the appropriate regional office of the commission not later than 15 working days after occurrence of the event. [30 TAC 116.115(b)(2)(A)]
4. **Start-up Notification.** The appropriate air program regional office shall be notified prior to the commencement of operations of the facilities authorized by the permit in such a manner that a representative of the commission may be present. The permit holder shall provide a separate notification for the commencement of operations for each unit of phased construction, which may involve a series of units commencing operations at different times. Prior to operation of the facilities authorized by the permit, the permit holder shall identify the source or sources of allowances to be utilized for compliance with Chapter 101, Subchapter H, Division 3 of this title (relating to Mass Emissions Cap and Trade Program). [30 TAC 116.115(b)(2)(B)(iii)]
5. **Sampling Requirements.** If sampling is required, the permit holder shall contact the commission's Office of Compliance and Enforcement prior to sampling to obtain the proper data forms and procedures. All sampling and testing procedures must be approved by the executive director and coordinated with the regional representatives of the commission. The permit holder is also responsible for providing sampling facilities and conducting the sampling operations or contracting with an independent sampling consultant. [30 TAC 116.115(b)(2)(C)]

6. **Equivalency of Methods.** The permit holder must demonstrate or otherwise justify the equivalency of emission control methods, sampling or other emission testing methods, and monitoring methods proposed as alternatives to methods indicated in the conditions of the permit. Alternative methods shall be applied for in writing and must be reviewed and approved by the executive director prior to their use in fulfilling any requirements of the permit. [30 TAC 116.115(b)(2)(D)]
7. **Recordkeeping.** The permit holder shall maintain a copy of the permit along with records containing the information and data sufficient to demonstrate compliance with the permit, including production records and operating hours; keep all required records in a file at the plant site. If, however, the facility normally operates unattended, records shall be maintained at the nearest staffed location within Texas specified in the application; make the records available at the request of personnel from the commission or any air pollution control program having jurisdiction; comply with any additional recordkeeping requirements specified in special conditions attached to the permit; and retain information in the file for at least two years following the date that the information or data is obtained. [30 TAC 116.115(b)(2)(E)]
8. **Maximum Allowable Emission Rates.** The total emissions of air contaminants from any of the sources of emissions must not exceed the values stated on the table attached to the permit entitled "Emission Sources--Maximum Allowable Emission Rates." [30 TAC 116.115(b)(2)(F)]
9. **Maintenance of Emission Control.** The permitted facilities shall not be operated unless all air pollution emission capture and abatement equipment is maintained in good working order and operating properly during normal facility operations. The permit holder shall provide notification for upsets and maintenance in accordance with 30 TAC 101.201, 101.211, and 101.221 of this title (relating to Emissions Event Reporting and Recordkeeping Requirements; Scheduled Maintenance, Startup, and Shutdown Reporting and Recordkeeping Requirements; and Operational Requirements). [30 TAC 116.115(b)(2)(G)]
10. **Compliance with Rules.** Acceptance of a permit by an applicant constitutes an acknowledgment and agreement that the permit holder will comply with all rules, regulations, and orders of the commission issued in conformity with the TCAA and the conditions precedent to the granting of the permit. If more than one state or federal rule or regulation or permit condition is applicable, the most stringent limit or condition shall govern and be the standard by which compliance shall be demonstrated. Acceptance includes consent to the entrance of commission employees and agents into the permitted premises at reasonable times to investigate conditions relating to the emission or concentration of air contaminants, including compliance with the permit. [30 TAC 116.115(b)(2)(H)]
11. **This** permit may not be transferred, assigned, or conveyed by the holder except as provided by rule. [30 TAC 116.110(e)]
12. **There** may be additional special conditions attached to a permit upon issuance or modification of the permit. Such conditions in a permit may be more restrictive than the requirements of Title 30 of the Texas Administrative Code. [30 TAC 116.115(c)]
13. **Emissions** from this facility must not cause or contribute to a condition of "air pollution" as defined in Texas Health and Safety Code (THSC) 382.003(3) or violate THSC 382.085. If the executive director determines that such a condition or violation occurs, the holder shall implement additional abatement measures as necessary to control or prevent the condition or violation.
14. **The** permit holder shall comply with all the requirements of this permit. Emissions that exceed the limits of this permit are not authorized and are violations of this permit.

Special Conditions

Permit Numbers 1037 and PSDTX924M2

Emission Limitations

1. Total emissions from this facility shall not exceed values stated on the attached table entitled "Emission Sources - Maximum Allowable Emission Rates." In addition, this permit authorizes all emissions from planned startup and shutdown activities associated with facilities or groups of facilities that are authorized by this permit. **(03/13)**

Fuel Specification

2. Fuel for the Wood-Fired Boiler (Emission Point No. [EPN] 22) shall be limited to raw wood biomass (wood, sawdust, and bark). No processed wood containing resins or other non-natural materials shall be fired in this boiler. Some of this fuel may inadvertently come into contact with small amounts of hydraulic, lube, or other oils. The use of any other types of fuel will require written approval of the Executive Director of the TCEQ. **(08/11)**

Federal Applicability

3. These facilities shall comply with all applicable requirements of the EPA Regulations on National Emission Standards for Hazardous Air Pollutants for Source Categories in 40 CFR Part 63, specifically the following:
 - A. Subpart A - General Provisions; and
 - B. Subpart DDDD – Plywood and Composite Wood Products. **(08/11)**

Opacity/Visible Emission Limitations

4. Opacity of emissions from the Studmill and Sawmill Dry Kiln Vents (EPNs 91, 92, 101, 102, 103, 104, and 130) shall not exceed 10 percent averaged over a six-minute period, except for those periods described in Title 30 Texas Administrative Code (30 TAC) §§ 111.111(a)(1)(E), 101.201, and 101.211. Opacity shall not exceed the limits set forth in 30TAC Chapter 111, Control of Air Pollution from Visible Emissions and Particulate Matter, during planned Maintenance, Startup, and Shutdown (MSS). The opacity shall be determined by the U.S. Environmental Protection Agency (EPA) Reference Method No. 9 or equivalent, as determined by the TCEQ Executive Director. **(06/15)**
5. Opacity of emissions from the Wood-Fired Boiler Electrostatic Precipitator (ESP) Stack (EPN 22) shall not exceed 10 percent averaged over a six-minute period, except for those periods described in 30 TAC § 111.111(a)(1)(E). Opacity shall not exceed the limits set forth in 30TAC Chapter 111, Control of Air Pollution from Visible Emissions and Particulate Matter, during planned MSS. The opacity shall be determined by EPA Reference Method No. 9 or equivalent, as determined by the TCEQ Executive Director. **(06/15)**

6. The planned MSS opacity excursions shall be limited to ten hours per year. **(3/09)**
7. Opacity of emissions from the Chipmill Cyclone Stack (EPN 95) and Shavings Baghouse Stack (EPN 105) shall not exceed 5 percent averaged over a six-minute period, except for those periods described in 30 TAC §§ 101.201 and 101.211. Opacity shall not exceed the limits set forth in 30TAC Chapter 111, Control of Air Pollution from Visible Emissions and Particulate Matter, during planned MSS. The opacity shall be determined by EPA Reference Method No. 9 or equivalent, as determined by the TCEQ Executive Director. **(06/15)**
8. Visible fugitive emissions from the conveying, handling, storing, or loadout of shavings, chips, and sawdust shall not exceed an opacity of 30% [as indicated in 30 TAC § 111.111(a)(8)(A)], except for those periods described in 30 TAC §§ 101.201, and 101.211. The opacity shall be determined by EPA Reference Method No. 9 or equivalent, as determined by the TCEQ Executive Director. **(08/11)**
9. Visible fugitive emissions from all the conveyors, truck loadout stations, railcar loading, boiler fuel house, and the planer mill shall not leave the property for more than 30 cumulative seconds in any six-minute period. **(06/15)**

Operational Limitations, Work Practices, And Plant Design

10. Material collected in the control devices and/or ash will be collected and disposed of in a manner that will minimize the material and/or ash from becoming airborne. No outdoor storage or stockpiling of ash will occur unless in sealed containers or incorporated into composting operations. **(03/03)**
11. Lumber processed through the planer and trim saws shall be limited to the plant throughput reflected at the kilns. **(08/11)**
12. Residual material from the trim saws and the planer unit shall be pneumatically collected and conveyed to a high efficiency cyclone that exhausts to a fabric filter. **(08/11)**
13. Wood biomass collected by cyclones or fabric filters shall be transferred from the collection device in such a manner as to minimize fugitive emissions. **(08/11)**
14. Material handling equipment such as chain conveyors, screens, chippers, hogs, and/or drop/transfer points shall be operated with covers in place; enclosed, shrouded, or covered; or controlled in a manner to minimize fugitive emissions. **(03/03)**
15. Loading of wood biomass such as bark, chips, or shavings onto vehicles for shipment off-property shall be conducted in a manner to minimize fugitive emissions. **(08/11)**
16. In-plant roads and other traffic areas shall be sprinkled with water or dust suppressants or cleaned to control fugitive emissions from vehicle traffic. **(03/03)**

17. The boiler fuel house shall be enclosed overhead and half-way down on all sides. The west, north, and south sides shall be equipped with plastic skirts on the lower half of the building, except for a 24-foot gap on the northeast side to allow loader movement. The east side of the fuel house shall not be skirted. **(3/09)**
18. During planned MSS, the boiler operating time shall not exceed ten hours per year. **(03/09)**
19. During normal production operations, the boiler shall not be operated if the ESP is not operating. **(03/09)**
20. The carbon monoxide (CO) emissions shall not exceed 1.3 lb/MMBtu (12.03 lb/ton of fuel) with overfire system and good combustion. **(3/09)**
21. Annual propane firing for Studmill Dry Kiln Nos. 1 and 2 during planned MSS shall not exceed a total propane usage of 12,500 gallons per year. **(06/15)**
22. This facility is authorized to operate up to 8,760. **(08/11)**
23. Emission rates are based on and the facilities shall be limited to the following:
 - A. Wood-Fired Boiler: Maximum hourly heat input of 184.6 million British thermal units per hour (MMBtu/hr); 120,000 pounds per hour of steam produced; 20.5 tons per hour (tph) of wood fuel burned (30-day average); and 149,744 tons per year (tpy) of wood fuel burned.
 - B. Studmill Kiln Nos. 1 & 2: 1.63 tph wood fuel burned (30-day average); 156 thousand board feet (MBF) per charge; and maximum annual wood fuel burned of 10,313 tpy and maximum annual production of 64,000 MBF/yr for each kiln.
 - C. Sawmill Dry Kiln Nos. 1- 5: Maximum charge of 141 MBF and maximum annual throughput of 345,600 MBF/yr of lumber/studs produced on a nominal dimensional basis for all five Sawmill Dry Kilns.
 - D. The throughput for Studmill Chip Loading (EPN 112) by truck and rail shall not exceed 67.16 tph (monthly average) and 300,000 tpy combined. **(06/15)**

No changes shall be made to the above limitations without prior approval by the Texas Commission on Environmental Quality (TCEQ). **(08/11)**

Demonstration Of Continuous Compliance

24. Upon request by the TCEQ Executive Director or the TCEQ Regional Director having jurisdiction, the holder of this permit shall perform stack sampling and/or other testing as required to establish the actual pattern and quantities of air contaminants being emitted into the atmosphere from (but not limited to) Wood-Fired Boiler (EPN 22); Studmill Dry Kiln Nos. 1 and 2 (EPNs 91 and 92); and Sawmill Dry Kiln No. 5 (EPN 130) to demonstrate compliance with the MAERT and with emission performance levels as specified in the

special conditions and/or otherwise prove satisfactory equipment performance. Sampling must be conducted in accordance with the TCEQ *Sampling Procedures Manual, Chapter 2* and in accordance with the applicable EPA 40 CFR procedures. Any deviations from those procedures must be approved by the TCEQ Executive Director or the appropriate TCEQ Regional Director prior to conducting sampling. **(06/15)**

25. The holder of this permit shall conduct a quarterly visible emissions determination to demonstrate compliance with the opacity limitations specified in this permit for the chipmill cyclone. This visible emissions determination shall be performed: 1) during normal plant operations, 2) for a minimum of six minutes, 3) approximately perpendicular to plume direction, 4) with the sun behind the observer (to the extent practicable), and 5) at least two stack heights, but not more than five stack heights, from the emission point. If visible emissions are observed from the emission point, the owner or operator shall:
 - A. Take immediate action to eliminate visible emissions, record the corrective action within 24 hours, and comply with any applicable requirements in 30 Texas Administrative Code (TAC) § 101.201, Emissions Event Reporting and Record Keeping Requirements; or
 - B. Determine opacity using 40 CFR Part 60, Appendix A, Test Method 9. If the opacity limit is exceeded, take immediate action (as appropriate) to reduce opacity to within the permitted limit, record the corrective action within 24 hours, and comply with applicable requirements in 30 TAC § 101.201, Emissions Event Reporting and Record Keeping Requirements. **(06/15)**
26. The holder of this permit shall conduct a quarterly visible emissions determination to demonstrate compliance with the visible emissions limitation specified in this permit from the conveyors, truck loadout stations, railcar loading, boiler fuel house, and the planer mill. This visible emissions determination shall be performed: 1) during normal plant operations, 2) for a minimum of six minutes, 3) approximately perpendicular to plume direction, 4) with the sun behind the observer (to the extent practicable), 5) at least 15 feet, but not more than 0.25 mile, from the plume, and 6) in accordance with EPA 40 CFR Part 60, Appendix A, Test Method 22, except where stated otherwise in this condition. If visible emissions exceed 30 cumulative seconds in any six-minute period, the owner or operator shall take immediate action (as appropriate) to eliminate the excessive visible emissions. The corrective action shall be documented within 24 business hours of completion. **(06/15)**

Sampling Requirements

27. The holder of this permit is responsible for providing sampling and testing facilities and conducting the sampling and testing operations at their own expense. Sampling ports and platforms shall be installed on the stack(s) according to the specifications set forth in the attachment entitled "Chapter 2, Stack Sampling Facilities" prior to stack sampling. Alternate sampling facility designs may be submitted for approval by the TCEQ Regional Office with jurisdiction.

28. Sampling shall be conducted in accordance with the TCEQ Sampling Procedures Manual, and EPA Test Methods in 40 CFR Part 60, Appendix A, and 40 CFR Part 51, Appendix M, using any of the methods below that applies: **(06/15)**
- A. Test Method 5 or 17, modified with a controlled condensate method subject to approval from the TCEQ prior to sampling, for the concentration of total PM;
 - B. Test Method 5 or 17 for the filterable concentration of PM (front-half catch);
 - C. Test Method 5 or 201A, for the filterable concentration of PM₁₀ (front-half catch);
 - D. Test Methods 201A and 202 (or Test Method 5), modified with a controlled condensate method subject to approval from the TCEQ prior to sampling, for the concentration of PM₁₀ including back-half condensibles;
 - E. Test Method 6, 6a, 6c, or 8 for the concentration of SO₂;
 - F. Test Method 7E, or equivalent methods, for the concentrations of NO_x and O₂;
 - G. Test Method 10 for the concentration of CO;
 - H. Test Method 25A, modified to exclude methane and ethane, for the concentration of VOC (to measure total carbon as propane or carbon, as appropriate); **(06/15)**
 - I. Test Method 9 for opacity;
29. A pretest meeting shall be held with personnel from the TCEQ before the required tests are performed. The TCEQ Regional Office with jurisdiction shall be notified not less than 45 days prior to sampling to schedule a pretest meeting. The notice shall include:
- A. Date for pretest meeting;
 - B. Date sampling will occur;
 - C. Points or sources to be sampled;
 - D. Name of firm conducting sampling;
 - E. Type of sampling equipment to be used; and
 - F. Method or procedure to be used in sampling.
- The purpose of the pretest meeting is to review the necessary sampling and testing procedures, to provide the proper data forms for recording pertinent data, and to review the format procedures for submitting the test reports.
30. Alternate sampling methods and representative unit testing may be proposed by the permit holder. A written proposed description of any deviation from sampling procedures or emission sources specified in permit conditions or TCEQ or EPA sampling procedures shall be made available to the TCEQ prior to the pretest meeting. Such a proposal must be approved by the TCEQ Regional Office with jurisdiction at least two weeks prior to sampling.

31. Requests to waive testing for any pollutant specified shall be submitted, in writing, for approval to the TCEQ Office of Air, Air Permits Division in Austin.
32. During stack sampling emission testing, the facilities shall operate at maximum represented production/throughput rates. Primary operating parameters that enable determination of production rates shall be monitored and recorded during the stack test. These parameters are to be determined at the pretest meeting.

If the plant is unable to operate at the maximum represented production/throughput rates during testing, then additional stack testing shall be required when production rate exceeds the previous stack test production rate by +10 percent unless otherwise determined, in writing, by the TCEQ Executive Director.

33. Requests for additional time to perform sampling shall be submitted to the TCEQ Regional Office with jurisdiction. Additional time to comply with the applicable federal requirements requires EPA approval, and requests shall be submitted to the TCEQ Regional Office with jurisdiction.
34. Copies of the final sampling report shall be forwarded to the TCEQ within 60 days after sampling is completed. Sampling reports shall comply with the attached provisions of Chapter 14 of the TCEQ *Sampling Procedures Manual*. The reports shall be distributed as follows:

One copy to the TCEQ Regional Office with jurisdiction.

One copy to the TCEQ Office of Air, Air Permits Division in Austin.

35. If, as a result of stack sampling, compliance with the permitted emission rates cannot be demonstrated, the holder of this permit shall adjust any operating parameters so as to comply with Special Condition No. 1 and the permitted emission rates. If the permit holder subsequently conducts additional stack sampling demonstrating compliance with the permitted emission rates, the newly established operating parameters shall be used to demonstrate compliance, and the requirements in Special Condition No. 36 shall no longer apply. **(06/15)**
36. If the holder of this permit is required to adjust any operating parameters for compliance, then beginning no later than 60 days after the date of the test conducted, the holder of this permit shall submit to the TCEQ, on a monthly basis, a record of adjusted operating parameters and daily records production sufficient to demonstrate compliance with the permitted emission rates. Daily records production and operating parameters shall be distributed as follows:

One copy to the TCEQ Regional Office with jurisdiction.

One copy to the TCEQ Office of Air, Air Permits Division in Austin. **(06/15)**

Compliance Assurance Monitoring

37. In order to maintain adequate particulate control for the emissions associated with the wood-fired boiler, and sawmill planer infeed conveyor, planer machine, trimmer, block hog, and resaw, the control devices associated with these sources shall be monitored according to Table 1: **(06/15)**

Table 1: Monitoring For Wood-Fired Boiler ESP and Shavings Baghouse

Control Device	Monitoring Parameter	Minimum Monitoring Frequency	Averaging Time	Deviation Limit
Wood-Fired Boiler ESP (EPN 22)	Secondary Voltage	Once per day	N/A*	Min. Secondary Voltage: 15 KVDC**
	Secondary Current	Once per day	N/A*	Min. Secondary Current: 100 mADC** Max. Secondary Current: 600mADC**
Shavings Baghouse (EPN 105)	Pressure Drop	Once per day	N/A*	Min. Pressure Drop: 0.1 in. H ₂ O Max. Pressure Drop: 5.0 in. H ₂ O

*Permit holder may elect to collect monitoring data on a more frequent basis than is required by the minimum frequency and calculate a daily average for purposes of determining whether a deviation has occurred. However, the additional data points must be collected on a regular basis and shall not be collected and used in particular instances in order to avoid reporting deviations.

**Average of two ESP fields.

Each monitoring device shall be calibrated at a frequency in accordance with the manufacturer's specifications, other written procedures that provide an adequate assurance that the device is calibrated accurately, or at least annually, whichever is more frequent. When calibrated the monitoring devices shall be accurate to within the following parameters:

ESP Secondary Voltage	±2% of reading or ±5% over its operating range
ESP Secondary Current	±1% of reading or ±5% over its operating range
Baghouse Pressure Drop	±0.5 in H ₂ O gauge (±125 Pa) or ±0.5% of span

The monitoring parameters must be measured and recorded at the frequency indicated in the table above. Immediate corrective action should be taken if the monitoring parameters fall outside of the range specified in this condition. **(3/09)**

Recordkeeping Requirements

38. Records shall be maintained at this facility site and made available at the request of personnel from TCEQ or any other air pollution control program having jurisdiction to demonstrate compliance with permit limitations. These records shall be totaled for each calendar month, retained for a 5-year period, and include the following:
- (1) Average daily production throughput in terms of board feet calculated monthly;
 - (2) Hourly steam production in pounds per hour (no monthly total required).
 - (3) Wood fuel burned in the wood-fired boiler in tons per hour (30-day-average).
 - (4) Wood fuel feed rate to the kiln wood burner, logged with each kiln charge on a tons per hour basis and totalized monthly.
 - (5) Quarterly observations for visible emissions and/or opacity determinations from the conveying, handling, storing, or loadout of shavings, chips, and sawdust
 - (6) Hourly records of opacity readings during planned MSS activities of the wood-fired boiler (no monthly total required).
 - (7) Annual tally of minutes and hours per year of opacity excursions during planned MSS activities of the wood-fired boiler (no monthly total required).
 - (8) Hourly and annual ERs in lbs/hr and tpy, respectively, of VOC, PM₁₀, NO_x, CO, and SO₂ for EPNs 22, 91, and 92 during planned MSS activities (no monthly total required).
 - (9) Records of the test/sample results for all the pollutants sampled (no monthly total required). **(08/11)**

Date: June 19, 2015

EMISSION SOURCES - MAXIMUM ALLOWABLE EMISSION RATES

Permit Numbers 1037 and PSDTX924M2

This table lists the maximum allowable emission rates and all sources of air contaminants on the applicant's property covered by this permit. The emission rates shown are those derived from information submitted as part of the application for permit and are the maximum rates allowed for these facilities, sources, and related activities. Any proposed increase in emission rates may require an application for a modification of the facilities covered by this permit.

AIR CONTAMINANTS DATA

Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates (6)	
			lbs/hour	TPY (4)
EPN 21A	Boiler Fuel House (5)	PM	0.08	0.30
		PM ₁₀	0.04	0.15
EPN 22	Wood-Fired Boiler ESP Stack	VOC	10.25	37.44
		NO _x	30.75	112.31
		SO ₂	0.16	0.60
		PM	10.71	39.08
		PM ₁₀	10.71	39.08
		CO	246.68	900.96
EPN 22 (MSS)	Wood-Fired Boiler ESP Stack - MSS	VOC	1.00	0.01
		NO _x	3.10	0.02
		SO ₂	0.73	<0.01
		PM	15.32	0.08
		PM ₁₀	15.32	0.08
		CO	200.03	1.00
EPN 27A	Planer Mill Area Baghouse Vents	PM	0.83	3.62
		PM ₁₀	0.83	3.62

EMISSION SOURCES - MAXIMUM ALLOWABLE EMISSION RATES

Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates (6)	
			lbs/hour	TPY (4)
EPN 91	Studmill Dry Kiln No. 1 Vents	VOC (7)	19.03	78.09
		NO _x	2.41	9.88
		SO ₂	0.56	1.77
		PM	1.43	4.55
		PM ₁₀	1.43	4.55
		PM _{2.5}	0.31	1.00
		CO	12.74	40.43
		HAPS (8)	1.71	6.99
EPN 91 (MSS)(9)	Studmill Dry Kiln No. 1 - MSS	VOC	0.01	---
		NO _x	0.21	---
		SO ₂	0.01	---
		PM	0.01	---
		PM ₁₀	0.01	---
		PM _{2.5}	0.01	---
		CO	0.12	---
EPN 92	Studmill Dry Kiln No. 2 Vents	VOC (7)	19.03	78.09
		NO _x	2.41	9.88
		SO ₂	0.56	1.77
		PM	1.43	4.55
		PM ₁₀	1.43	4.55

EMISSION SOURCES - MAXIMUM ALLOWABLE EMISSION RATES

Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates (6)	
			lbs/hour	TPY (4)
		PM _{2.5}	0.31	1.00
		CO	12.74	40.43
		HAPs (8)	1.71	6.99
EPN 92 (MSS) (9)	Studmill Dry Kiln No. 2 - MSS	VOC	0.01	---
		NO _x	0.21	---
		SO ₂	0.01	---
		PM	0.01	---
		PM ₁₀	0.01	---
		PM _{2.5}	0.01	---
		CO	0.12	---
EPN 91 and 92 MSS (9)	Studmill Kiln Nos. 1 and 2 MSS	VOC	---	0.01
		NO _x	---	0.08
		SO ₂	---	<0.01
		PM	---	<0.01
		PM ₁₀	---	<0.01
		PM _{2.5}	---	<0.01
		CO	----	0.05
EPN 95	Chipmill Green Chips Cyclone Stack	PM	0.30	1.05
		PM ₁₀	0.30	1.05

EMISSION SOURCES - MAXIMUM ALLOWABLE EMISSION RATES

Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates (6)	
			lbs/hour	TPY (4)
EPN 101 (10)	Sawmill Dry Kiln No. 1 Vents	VOC	15.76	65.66
		PM	0.47	1.94
		PM ₁₀	0.47	1.94
EPN 102 (10)	Sawmill Dry Kiln No. 2 Vents	VOC	15.76	65.66
		PM	0.47	1.94
		PM ₁₀	0.47	1.94
EPN 103 (10)	Sawmill Dry Kiln No. 3 Vents	VOC	15.76	65.66
		PM	0.47	1.94
		PM ₁₀	0.47	1.94
EPN 104 (10)	Sawmill Dry Kiln No. 4 Vents	VOC	15.76	65.66
		PM	0.47	1.94
		PM ₁₀	0.47	1.94
EPN 105	Shavings Baghouse Stack	PM	1.90	2.92
		PM ₁₀	1.90	2.92
EPN 106	Shavings Truck Bin (5)	PM	0.10	0.05
		PM ₁₀	0.05	0.02
EPN 107	Sawmill Chip Truck Bin (5)	PM	0.36	0.70
		PM ₁₀	0.17	0.33
EPN 109	Sawmill Bark Screen/Hog (5)	PM	0.17	0.23
		PM ₁₀	0.08	0.11

EMISSION SOURCES - MAXIMUM ALLOWABLE EMISSION RATES

Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates (6)	
			lbs/hour	TPY (4)
EPN 110	Chipmill Chip Loading (5)	PM	0.17	0.23
		PM ₁₀	0.08	0.11
EPN 111	A & B Sawmill Chip Screens (5)	PM	0.07	0.09
		PM ₁₀	0.03	0.04
EPN 112	Studmill Chip Loading (5)	PM	0.06	0.14
		PM ₁₀	0.03	0.06
EPN 113A	Studmill Chip Screen (5)	PM	0.06	0.08
		PM ₁₀	0.03	0.04
EPN 113B	Studmill Bark Hog (5)	PM	0.05	0.07
		PM ₁₀	0.02	0.03
EPN 114	Chipmill Chip Screen (5)	PM	0.03	0.12
		PM ₁₀	0.02	0.06
EPN 115	Chipmill Bark Hog and Screen (5)	PM	0.02	0.03
		PM ₁₀	0.01	0.02
EPN 119	Haul Roads (5)	PM	--	23.92
		PM ₁₀	--	4.66
EPN 130 (10)	Sawmill Dry Kiln No. 5 Vents	VOC	15.76	65.66
		PM	0.47	1.94
		PM ₁₀	0.47	1.94

EMISSION SOURCES - MAXIMUM ALLOWABLE EMISSION RATES

- (1) Emission point identification - either specific equipment designation or emission point number from plot plan.
- (2) Specific point source name. For fugitive sources, use area name or fugitive source name.
- (3)
 - VOC - volatile organic compounds as defined in Title 30 Texas Administrative Code § 101.1
 - NO_x - total oxides of nitrogen
 - SO₂ - sulfur dioxide
 - PM - total particulate matter, suspended in the atmosphere, including PM₁₀ and PM_{2.5}, as represented
 - PM₁₀ - total particulate matter equal to or less than 10 microns in diameter, including PM_{2.5}, as represented
 - PM_{2.5} - particulate matter equal to or less than 2.5 microns in diameter
 - CO - carbon monoxide
 - HAP - hazardous air pollutant as listed in § 112(b) of the Federal Clean Air Act or Title 40 Code of Federal Regulations (40 CFR) Part 63, Subpart C
- (4) Compliance with annual emission limits (tons per year) is based on a 12 month rolling period.
- (5) Emission rate is an estimate and is enforceable through compliance with the applicable special condition(s) and permit application representations.
- (6) Planned startup and shutdown emissions are included, as well as planned maintenance activities identified as part of permit alteration issued on March 28, 2013.
- (7) VOC emissions include total HAPs.
- (8) HAPs include Acetaldehyde (0.51 tpy), Acrolein (0.19 tpy), Formaldehyde (1.13 tpy), Methanol (5.12 tpy), and propionaldehyde (0.03 tpy) from each Studmill Dry Kiln.
- (9) For determination of compliance, annual emissions EPNs 91 MSS and 92 MSS should be Summed.
- (10) For determination of compliance, emissions from the five steam-heated Kilns (EPNs 101, 102, 103, 104, and 130) should be summed.

Date: June 19, 2015